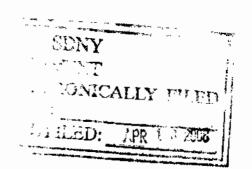


STATE OF NEW YORK OFFICE OF THE ATTORNEY GENERAL



ANDREW M. CUOMO Attorney General

LESLIE G. LEACH Executive Deputy Attorney General Division of State Counsel

JUNE DUFFY Assistant Attorney General in Charge Liftgation Bureau

> Writer's Direct Dial-(212) 416-8612 **SO ORDERED**

April 17, 2008

BY HAND

Honorable George B. Daniels United States District Judge United States District Court Southern District of New York 500 Pearl St., Room 630 New York, NY 10007

> Brown v. Goldstein, ct. al., 08-CV-2207 (GBD)(AJP) Re:

Dear Judge Daniels:

I am an Assistant Attorney General in the Office of Andrew M. Cuomo, Attorney General of the State of New York. I represent defendant Lori Beth Goldstein, M.D., who has been served and has requested representation. To date, the other named defendants, C.O. N. Davis, Sgt. Furness, and the New York Department of Corrections, have not been served and have not requested representation from our office.

I respectfully write to request an extension of defendant Goldstein's time to answer or otherwise move with respect to plaintiff's complaint from April 21, 2008 up to and including June 6, 2008. I have not sought the consent of the pro se plaintiff as she is currently incarcerated and I wanted to make the request forthwith. No previous requests for an extension of time have been made.

An extension of time is necessary to investigate the facts alleged in the complaint, obtain the necessary documents, and prepare an appropriate response. An extension of time would also allow the plaintiff to serve the additional defendants, who, based on the complaint, appear to be State defendants, and in the interest of judicial economy, would permit an answer to be filed

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on behalf of all defendants at the same time. By making such a request, we are not waiving any rights the defendants not yet served may have, including the right not to appear or the right to answer or move with respect to lack of personal jurisdiction.

Thank you for your consideration of this request.

Respectfully submitted,

Inna Reznik

Assistant Attorney General

cc: Lyndira Brown (by first class mail) DIN # 03-60757 Bedford Hills Correctional Facility

247 Harris Road

Bedford Hills, New York 10507-2496